

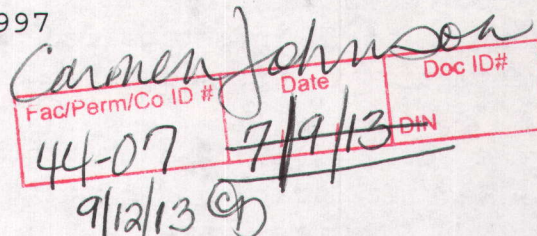
State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



July 17, 1997

Mr. Jack Horton
Haywood County Manager
420 N. Main Street
Waynesville, N.C. 28786



RE: Landfill Expansion of the Haywood County White Oak Landfill
Permit Number 44-07

Dear Mr. Horton,

The Solid Waste Section has received the June 16, 1997, submittal entitled "Permit Modification Landfill Expansion" prepared by Steffen Robertson and Kirsten (NC), Inc. As outlined in the letter of October 29, 1996, to you from James C. Coffey or our Section, "If the County proposes to laterally expand the existing lined MSWLF unit within the 23-acre area, permit renewal is required". "The permitting requirements for permit renewal are contained in Rule .1617(e)..."

"Permit Renewal" requirements, Rule .1617(e), are significantly different from the requirements for "Modifications to the Permit", Rule .1617(c). "Permit Renewal", in .1617(e)(2), requires "an engineering plan that is prepared for the initial phase of landfill development prepared in accordance with Rule .1620 of this Section". As part of the Engineering Plan, Rule .1620(d)(4) requires "A copy of the Design Hydrogeologic Report prepared in accordance with Paragraph (b) of Rule .1623". Therefore, a Design Hydrogeologic Study according to the requirements of Rule .1623(b) is necessary for the "area of investigation" associated with the proposed new phase of landfill development (Waste Cell 4). The "area of investigation" includes the proposed expansion footprint and surrounding area that is subject to water quality monitoring.

The June 16, 1997, "Permit Modification Landfill Expansion" does not contain a Design Hydrogeologic Report. Until this Report is prepared and submitted, the hydrogeologic review of the "Permit Renewal" for "a permit to construct a lateral expansion" can not be done. Rule .0202(a)(3) requires that "the geologic study shall bear the seal of a (N.C.) licensed professional geologist".

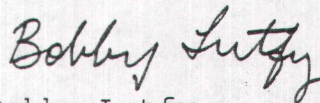
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Haywood County's consulting geologist should meet with me to discuss a field investigation plan for the additional hydrogeologic investigation required for the proposed new phase of development.

In the Oct. 26, 1996, letter from Bob Hessler to Mr. William Meyer, Mr. Hessler states the following: "In preparing the current landfill, springs feeding the west branch were covered. Your department has stated that landfilling will not be allowed over these spring locations." Please have your consultant discuss past and proposed soil borrow and stockpile activities at the White Oak Landfill facility. Specifically address the allegation that "springs feeding the west branch were covered".

If you or your consultant have any questions about this letter or the requirements for "Permit Renewal", or if you would like to arrange for a meeting to discuss these issues, please call me at (919) 733-0692, extension 258.

Sincerely,



Bobby Lutfy
Hydrogeologist
Solid Waste Section

cc: Jim Coffey, Solid Waste Section
Jim Patterson, SWS - Asheville
Stephan MacQueen, Steffen Robertson and Kirsten

Jim
for your information

Bob Hessler

Bob Hessler

Fax # (704) 627-2402

Wait til Friday

Jack Horton

Hessler - Bill Meyer

704 452-6825